

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Petition of Boston Edison Company and Commonwealth
Electric Company for Approvals relating to the Termination
of Power Purchase Agreements with MASSPOWER

D.T.E. 04-61

ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS

The following are the Attorney General's First Set of Information Requests in the above captioned proceeding.

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Boston Edison Company and / or Commonwealth Electric d/b/a NSTAR Electric or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.

5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide three copies of each response.
16. The term "Company" refers to Boston Edison Company and / or Commonwealth Electric Company d/b/a/ NSTAR Electric Company. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

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ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS

The following are the Attorney General's FIRST SET of discovery in the above referenced docket.

- AG-1-1 Please identify and list all contracts, agreements, letters of understanding and amendments thereto between the Company and the owners of the MASSPOWER generating facility since its inception. Please also provide copies of all such documents.
- AG-1-2 Please provide copies of all bids that include the MASSPOWER contract. To the extent that later bids were communicated orally, please provide a history of those oral bids.
- AG-1-3 Please provide copies of all evaluations of the bids for the MASSPOWER contract done by and for the Company.
- AG-1-4 Please provide copies of all of the bidder questions and answers regarding the contract.
- AG-1-5 Please indicate whether there were any bids in the 1999-2000 Initial Auction on the MASSPOWER contract. If so, please provide copies of those bids along with all analyses of each bid done by and/or for the Company.
- AG-1-6 Please indicate whether Concentric Energy Advisors have been or are presently employed by MASSPOWER or any of its owners. If so, please provide a complete and detailed description of the services provide by Concentric.

- AG-1-7 Please indicate whether any of the attorneys of Keegan, Werlin, and Pabian have provided or is providing services to MASSPOWER or any of its owners.
- AG-1-8 Please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the use of the 7.82 percent discount rate used by Concentric.
- AG-1-9 Please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the use of the 6.61 percent discount rate used by the Company.
- AG-1-10 Referring to Exhibit NSTAR-RBH, page 27, lines 7 through 10, please provide copies of all of the series of analyses under different power and fuel price scenarios performed by CEA and / or the Company.
- AG-1-11 Referring to Exhibit NSTAR-RBH-6, page 2, please provide the history from the existing contract's inception date of the actual amounts for each of these columns.
- AG-1-12 Please provide the monthly capacity factor for MASSPOWER, since its startup.
- AG-1-13 Referring to Exhibit NSTAR-RBH-6, page 2, Column "Total KWh," please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the KWh amounts shown for each year along with citations to the power agreement where applicable.
- AG-1-14 Referring to Exhibit NSTAR-RBH-6, page 2, Column "Energy Charge," please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the Energy Charge amounts shown for each year along with citations to the power agreement where applicable.
- AG-1-15 Referring to Exhibit NSTAR-RBH-6, page 2, Column "Operating Cost," please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the Operating Cost amounts shown for each year along with citations to the power agreement where applicable.
- AG-1-16 Referring to Exhibit NSTAR-RBH-6, page 2, Column "Wheeling Cost," please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the Wheeling Cost amounts shown for each year along with citations to the power agreement where applicable.

- AG-1-17 Referring to Exhibit NSTAR-RBH-6, page 2, Column “Investment Cost,” please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the Investment Cost amounts shown for each year along with citations to the power agreement where applicable.
- AG-1-18 Referring to Exhibit NSTAR-RBH-6, page 2, Column “Canadian Pipeline Demand Cost,” please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the Canadian Pipeline Demand Cost amounts shown for each year along with citations to the power agreement where applicable.
- AG-1-19 Referring to Exhibit NSTAR-RBH-6, page 2, Column “US Pipeline Demand Cost,” please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the US Pipeline Demand Cost amounts shown for each year along with citations to the power agreement where applicable.
- AG-1-20 Referring to Exhibit NSTAR-RBH-6, page 2, Column “Bonus / Penalty Cost Adjustment,” please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the Bonus / Penalty Cost Adjustment amounts shown for each year along with citations to the power agreement where applicable.
- AG-1-21 Referring to Exhibit NSTAR-RBH-6, page 2, please provide a complete copy of the source document for the GNP forecasts that were used to estimate the costs on this page.
- AG-1-22 Referring to Exhibit NSTAR-RBH-6, page 3, Column “Total KWh,” please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the KWh amounts shown for each year along with citations to the power agreement where applicable.
- AG-1-23 Referring to Exhibit NSTAR-RBH-6, page 3, Column “Energy Charge,” please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the Energy Charge amounts shown for each year along with citations to the power agreement where applicable.
- AG-1-24 Referring to Exhibit NSTAR-RBH-6, page 3, Column “Operating Cost,” please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the Operating Cost amounts shown for each year along with citations to the power agreement where applicable.

- AG-1-25 Referring to Exhibit NSTAR-RBH-6, page 3, Column “Investment Cost,” please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the Investment Cost amounts shown for each year along with citations to the power agreement where applicable.
- AG-1-26 Referring to Exhibit NSTAR-RBH-6, page 3, Column “Pipeline Demand Cost,” please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the Pipeline Demand Cost amounts shown for each year along with citations to the power agreement where applicable.
- AG-1-27 Referring to Exhibit NSTAR-RBH-6, page 3, Column “Bonus / Penalty Cost Adjustment,” please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the Bonus / Penalty Cost Adjustment amounts shown for each year along with citations to the power agreement where applicable.
- AG-1-28 Referring to Exhibit NSTAR-RBH-6, page 4, Column “Total KWh,” please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the KWh amounts shown for each year along with citations to the power agreement where applicable.
- AG-1-29 Referring to Exhibit NSTAR-RBH-6, page 4, Column “Total Energy Charge,” please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the Total Energy Charge amounts shown for each year along with citations to the power agreement where applicable.
- AG-1-30 Referring to Exhibit NSTAR-RBH-6, page 4, Column “Total Capacity Charge,” please provide the workpapers, calculations, formulas, assumptions, and supporting documentation for the Total Capacity amounts shown for each year along with citations to the power agreement where applicable.
- AG-1-31 Referring to Exhibit NSTAR-RBH-6, page 5 please provide a complete copy of the Fall 2003 Henwood Energy Services Inc.’s Northeast Electricity and Gas Price Outlook. Please also provide the date that the Fall 2003 Henwood Energy Services Inc.’s Northeast Electricity and Gas Price Outlook was issued.
- AG-1-32 Referring to Exhibit NSTAR-RBH-6, page 5, please provide a complete copy of the May 2004 update to the Fall 2003 Henwood Energy Services Inc.’s Northeast Electricity and Gas Price Outlook.
- AG-1-33 Please provide an update to the May 2004 market price of energy, capacity, and fuel for the Henwood Energy Service Inc.’s Northeast Electricity and Gas Price Outlook.

- AG-1-34 Referring to Exhibit NSTAR-RBH-6, page 5, please provide citations to the Henwood Energy Service Inc.'s Northeast Electricity and Gas Price Outlook for each of the numbers on that page. To the extent that they are not directly shown in the Henwood document, please provide the additional workpapers, calculations, formulas, assumptions, and supporting documentation used to derive those numbers.
- AG-1-35 Referring to Exhibits NSTAR-RBH-5, and NSTAR-RBH-6, please recalculate the amounts shown on those exhibits, changing only the power and fuel costs and prices so that they are fixed at the most recent numbers for the entire period.
- AG-1-36 Referring to Exhibit NSTAR-RBH, pages 1 through 4, please provide copies of all generation asset financial valuations done by Mr. Hevert and / or the members of Concentric Energy Advisors, Inc. Please also provide copies of all testimony associated with those valuations.
- AG-1-37 Please provide a complete copy of the Fall 2004 Henwood Energy Service Inc.'s Northeast Electricity and Gas Price Outlook, when it becomes available.
- AG-1-38 Please provide an update to Exhibits NSTAR-BEC-GOL-2 through -4 and NSTAR-COM-GOL-2 through-4 using the Fall 2004 Henwood Energy Service Inc.'s Northeast Electricity and Gas Price Outlook, when it becomes available.
- AG-1-39 Please provide an update to Exhibits NSTAR-RBH-5 and -6 using the Fall 2004 Henwood Energy Service Inc.'s Northeast Electricity and Gas Price Outlook, when it becomes available.
- AG-1-40 Please provide copies of the monthly invoices for the last 24 months associated with the MASSPOWER contracts along with all associated calculations and supporting documentation.
- AG-1-41 Please provide the history of MASSPOWER's heat rates for each month of operation since the start date.
- DATED: October 1, 2004.